

EDWARD W. LYLE
Regulatory Counsel
1805 - 45th Street N.W.
Washington D.C. 20007-2070 USA
1 (202) 333-4280 (telephone) 1 (202) 333-4282 (fax)
ewlyle@west1805.com

VIA CDX AND ELECTRONIC MAIL

November 10, 2014

Mr. Kristan Markey
US Environmental Protection Agency
New Chemicals Program (7405M)
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Re: CAS Nos. 1417900-96-9 (P-12-539), 1401947-24-0 (P-13-107)
and 1402738-52-6 (P-13-109)
Trinity/Qualice vLCCP Testing Program

Dear Mr. Markey:

On behalf of Trinity Manufacturing, Inc., the original notifier of the PMNs referenced above, and its sister company Qualice, LLC, both of Hamlet, North Carolina, I am submitting to you herewith the following documents via both CDX and e-mail:

1. In response to a request from your office, a final report on analytical testing of the feedstock material used in the three CP substances referenced above; and
2. A proposed work plan submitted by a second laboratory, Avomeen Analytical Services of Ann Arbor, MI, for developing the methodology needed to characterize the referenced substances.

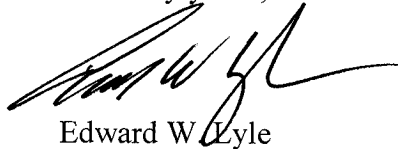
We apologize for the time that has been needed to get these documents to you. After our last conference call, we went back and had Ricerca Biosciences, the original laboratory we retained, re-check the entirety of its work. When that check did not reveal any insights about the previously-submitted results, we looked for a second laboratory that, given the complexities of the substances in question, could successfully undertake the methodology development for and characterization of those substances. Subject to EPA's response to the documents we are submitting today, we have tentatively chosen Avomeen for these tasks.

Mr. Kristan Markey
November 10, 2014
Page Two

After EPA has had an opportunity to review the attached documents, we suggest a conference call so that we may obtain any comments the Agency may have and ask any questions we may have in response, and then proceed as quickly as possible to submit the required characterization of these substances.

Should EPA have any preliminary comments or questions about the documents being submitted today, I can be reached at (202) 333-4280.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Edward W. Lyle", with a stylized flourish extending to the right.

Edward W. Lyle
Regulatory Counsel for Trinity
Manufacturing, Inc. and Qualice LLC

EWL:bw

Enclosures